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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion
7 to File Under Seal (the “Administrative Motion”). The Administrative Motion seeks an order sealing
8 highlighted portions of Defendants Otto Trucking’s Motion to Compel (“Otto Trucking’s Motion”) and of Exhibit 10 to the Vu Declaration, as well as the entirety of Exhibits 2 and 4-9 thereto.

10 3. Otto Trucking’s Motion (portions marked in red boxes in version filed herewith),
11 Exhibits 2, 4, 6, and 8 (entire documents), Exhibits 5 and 7 (portions highlighted in green in versions
12 filed herewith), and Exhibit 10 (yellow highlighted portions) contain, reference, and/or describe
13 Waymo’s highly confidential and sensitive business information. Such information includes details
14 regarding Waymo’s security measures and protocols, the scope of forensic investigations conducted,
15 and detailed computer forensics regarding access to Waymo’s trade secrets. I understand that Waymo
16 maintains this information as confidential. The public disclosure of this information would cause
17 significant competitive harm to Waymo, as its security measures and computer forensics methods
18 would become known to competitors who could use such information to Waymo’s disadvantage.

19 4. Exhibit 9 (green highlighted portions in version filed herewith) contains highly
20 sensitive information that Waymo seeks to seal. Specifically, those portions contain the web domain
21 addresses that host Waymo’s confidential documentation related to the forensic investigation. Public
22 disclosure of such information will give bad actors seeking to hack Waymo’s databases a target to
23 attack. Further, there is no public purpose served by disclosing the precise web or IP addresses at
24 which the documents reside.

25 5. Exhibits 5, 7, and 9 (portions highlighted in green in version filed herewith)
26 additionally contain email addresses and/or phone numbers of Waymo employees and former
27 employees involved in this case, the disclosure of which would cause Waymo and those employees
28 substantial harm due to the high public profile of this litigation.

6. Waymo's request to seal is narrowly tailored to those portions of Otto Trucking's Motion and Exhibits 2 and 4-10 that merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on October 24, 2017.

By /s/ Felipe Corredor
Felipe Corredor
Attorneys for WAYMO LLC

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven